

<b>Audit Plan No. Internal Audit</b>		<b>Audit Date(s)</b> May -June, 2004
<b>Audit Team;</b> Denise Rigney, Marie Holman, Bill Arguto, Anita Provenzano		
<b>A. Audit objectives and scope -</b> <i>Assess whether the EMS implemented at the EPA Region III office ( Phila) is conforming to the requirements of ISO standard 14001 and EPA EMS audit protocol. Determine if the EMS has been implemented facility wide and is operating systematically achieving the desired goal</i> .		
<b>B. Audit Criteria</b> <i>EMS protocols contained in the EMS procedure section 4-p of the EMS manual and the ISO 14001 protocols</i>		
<b>C. Organization/functional units to be audited</b> <i>Selected functions in the EPA Regional office</i>		
<b>D. Contact person</b>	<b>Department/Location</b>	<b>Responsibility</b>
Steve Johnson	Office Of Policy & Mngment	Human Resources
Jon Capacosa	Water Protection Division	Division Director
Ben Mykijewycz	Hazrd Site Cleanup Division	Contracts/ State Support Section
Susan Nothnagel	Health Unit	Nurse
Ems Team Meeting		
Yvette Hamilton	Office Of Regional Counsel	EMS team member/ Regional Counsel
Brian Kovak	Office Of Policy & Mngment	Facilities Management Safety officer
Donna Sutsko	Office Of Policy & Mngment	Facilities Management
Helen McCue	Office Of Policy & Mngment	Facilities Management
Paul Leonard	Hazrd Site Cleanup Division	Federal Facilities Branch
<b>E. High priority elements</b> <i>The audit team will focus on monitoring and measurement - corrective action and awareness and knowledge of the EMS. A high priority of the audit team will be to assess if the EMS is part of the culture of the organization and integrated into the business organization.</i>		
<b>F. Audit procedure(s)</b>	<b>Title</b>	<b>Revision</b>

**G. Communication of observations/ findings during the audit**

*21 findings - 3 acceptable  
- 13 conditional  
- 5 unacceptable*

<b>H. Reference documents</b>	<b>Revision</b>
Website	Current Version - Internet
Procedures	EPA-R3-EM-02 Rev 3/04
Aspects & Impacts	1/03 original
Targets & Objectives	5/03 original
Manual	3/04
<b>I. Time/duration of audit</b> <i>Audit will consist of a series of interviews of Region III personnel, each interview will be no longer than 1 hour 5/24 - 5/27 Interviews Report development June 04</i>	
<b>J. Date</b>  <i>May - June 04</i>	<b>Location(s)</b> <i>EPA Region III 1650 Arch Street Philadelphia, PA 19103</i>
<b>L. Audit Team Members</b> <i>Bill Arguto, x-3367 (Lead) Marie Holman, x- 5463 Denise Rigney x-2726 Anita Provenzan0 x-5180</i>	
<b>M. Pre-audit conference schedule</b> <i>Preliminary meetings to discuss scope, interviews and material needed for audit and support May 10 - 14, 2004</i>	<b>N. Daily briefings schedule</b> <i>Brief EMS coordinator as needed Exit brief</i>
<b>O. Post- audit conference schedule</b>  <i>June 28 - 30, 04</i>	<b>P. Audit report schedule</b>  <i>June 04</i>
<b>Q. Confidentiality requirements:</b> <i>None</i>	
<b>R. Reporting and distribution requirements</b> <i>TBD</i>	
<b>Prepared by:</b> <i>Bill Arguto, Marie Holman, Denise Rigney</i>	<b>Reviewed and approved by:</b>

### **EMS Audit Findings Summary Table**

**Facility Name:** U. S. Environmental Protection Agency, Region III

**Team:** Marie Holman

**Date:** June, 2004

Denise Rigney

William Arguto

Anita Provenzano

Rating	Finding No.	Finding/ISO Std. No.	Comment
Acceptable	7	4.3.3 Objectives and Targets	Regional objectives and targets are listed on the website; discussed at EMS team meetings; and are part of the awareness training to all employees
Acceptable	8	4.3.4 Environmental Management Program (EMP)	Regional Action Plans are well-established for the 3 significant regional aspects (gas, electricity and paper).
Acceptable	16	4.4.3 Communication	Communication of the EMS could be enhanced with information on the presence of the objective and targets updated more frequently.
Unacceptable	5	4.3.2 Legal and Other Requirements	The EO 13101 and RCRA 6002 requiring Affirmative Procurement is not well-understood or complied with. The Region has not identified a Regional Recycling Coordinator, per E.O. 13101, Environmental Preferable Purchasing.
Unacceptable	13	4.4.2 Training, Awareness and Competence	Greater need for Professional EMS training and auditor training.

Unacceptable	19	4.4.6 Operational Controls	EMS shall extend to contractors.
Unacceptable	20	4.5.2 Non-Conformance and Corrective and Preventive Action	The Corrective Action Report from the EMS December 2003 audit does not follow the EMS Regional Procedure Manual.
Unacceptable	21	4.6 Management Review	The Environmental Management System should be evaluated to ensure its continuing suitability, adequacy and effectiveness. This review shall be documented. There is no available documented management review.
Conditional	1	4.2 Environmental Policy	The environmental policy should be strengthened by specifically including language in its scope to include the activities of contractors.
Conditional	2	4.3 Planning 4.3.1 Environmental Aspects	There is no evidence of additional activities and their associated aspects/impacts being evaluated. There is no periodic review established at this time.
Conditional	3	4.3.2 Legal and Other Requirements	compliance with E.O. 13148 in reducing use of hazardous materials (mercury in the Health Unit).
Conditional	4	4.3.2 Legal and Other Requirements	contractual requirements not included in the list of "Legal and Other Requirements."
Conditional	6	4.3.2 Legal and Other Requirements	Unable to determine if the EMS team evaluated internal instructions and Regional Orders.
Conditional	9	4.3.4 Environmental Management Program (EMP)	The Environmental Management Program (EMP) does not solicit new or best management practices that can be incorporated to enhance meeting the objective of the significant environmental aspect. It's limited and narrowly written (too prescriptive).
Conditional	10	4.4.1 Structure and Responsibility	Roles and responsibilities at the Division level are not fully defined or understood
Conditional	11	4.4.3 Implementation and Operations 4.2.1 Structure and Responsibility	Roles and Responsibilities at the Division level not fully defined
Conditional	12	4.4 - 4.4.2 Training, Awareness and Competence	New employee orientation training does not cover EMS awareness training.
Conditional	14	4.4.3 Communication	There is no formal communication mechanism back to the EMS coordination
Conditional	15	4.4.3 Communication	The EMS audit found formal communication links at certain levels of the organization but not at all levels.
Conditional	17	4.4.3 Communication	Operational Controls not communicated to all levels.

Conditional	18	4.4.5 Document Control	The EMS Regional Procedure Manual needs to include approval signature lines for senior management review and evaluation in all of the applicable procedures. Also, the documents need to be dated and the specific author identified
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**Facility Name:** U.S. Environmental Protection Agency Region III **Date:** July 2004

**Requirement:** 4.2 Environmental Policy

**Finding 1 :**

The environmental policy does not include language to address contractor/subcontractors and does not contain a commitment to sustainability.

**1. What is your rating for this activity?** Conditional

**2. In which areas or criteria do you find this activity strong?**

The environmental policy has been established, signed by top management, and communicated to all employees.

**3. In which areas or criteria do you find this activity weak?**

The environmental policy should be strengthened by specifically including language in its scope to include the activities of contractors.

**4. Comments on environmental management policies and procedures reviewed during this audit:**

Management may want to consider “sustainability principals” in their EMS policy statement.

**5. Comments on management quality and information organization:**

**Signature of EMS Auditor(s):**

**Facility Name:** U.S. Environmental Protection Agency Region III **Date:**

**Requirement:** 4.3 Planning      4.3.1 Environmental Aspects

**Finding 2 :**

The organization has not kept the information on the aspects/impacts up-to-date. New aspects have not been reviewed/re-evaluated.

**1. What is your rating for this activity? Conditional****2. In which areas or criteria do you find this activity strong?**

The EMS has established a set of significant aspects (gas, electric, paper) and has made significant progress.

**3. In which areas or criteria do you find this activity weak?**

There is no evidence of additional activities and their associated aspects/impacts being evaluated. It is unclear (section 4 procedures) how and when the periodic review (including the management review) will be conducted to determine when the new aspects and impacts will be addressed.

**4. Comments on environmental management policies and procedures reviewed during this audit:**Commitment to Continual Improvement

1. Management may want to re-evaluate R3's activities, products and services and their related environmental impacts, e.g., opportunity to "green" conferences, etc.
2. Audit team was unable to identify if sufficient resources would be allocated to the EMS implementation over a sustained period (no regular source of funding for EMS projects and training).

**5. Comments on management quality and information organization:**

**Signature of EMS Auditor(s):**



**Facility Name:** U.S. Environmental Protection Agency Region III      **Date:**

**Requirement:** 4.3.2      Legal and Other Requirements

**Finding 3 :**

No contractual requirements included in the list of “Legal and Other Requirements.”  
Management needs to clearly communicate legal and other requirements to all employees.  
 (“Provide Access” to the legal standard by translating into non-technical language, e.g. -  
contract requirements Operational Controls not communicated to all levels.)

**1. What is your rating for this activity?**

**2. In which areas or criteria do you find this activity strong?**

**3. In which areas or criteria do you find this activity weak?**

**4. Comments on environmental management policies and procedures reviewed during this audit:**

**5. Comments on management quality and information organization:**

**Signature of EMS Auditor(s):**

**Facility Name:** U.S. Environmental Protection Agency Region III      **Date:**

**Requirement:** 4.3.2 Legal and Other Requirements

**Finding 4 :**

E.O. 13148, Section 205, Use Reduction, Toxic Chemicals and Hazardous Substances and other pollutants, e.g., mercury .

**1. What is your rating for this activity?** Conditional

**2. In which areas or criteria do you find this activity strong?**

The EMS integration team (SHEM has the lead) has identified and has access to legal and other requirements. Office of Regional Counsel representative is on EMS integration team and provides consultation to management.

**3. In which areas or criteria do you find this activity weak?**

May not be completely complying with E.O. 13148 in reducing use of hazardous materials (mercury in the Health Unit).

**4. Comments on environmental management policies and procedures reviewed during this audit:**

**5. Comments on management quality and information organization:**

**Signature of EMS Auditor(s):**

**Facility Name:** U.S. Environmental Protection Agency Region III      **Date:**

**Requirement:**    4.3.2    Legal and Other Requirements

**Finding 4 :**

No contractual requirements included in the list of “Legal and Other Requirements.”  
Management needs to clearly communicate legal and other requirements to all employees.  
 (“Provide Access” to the legal standard by translating into non-technical language, e.g. -  
contract requirements.

**1. What is your rating for this activity?**    Conditional

**2. In which areas or criteria do you find this activity strong?**

**3. In which areas or criteria do you find this activity weak?**

A Region III EMS statement needs to be included in the “terms and conditions” of contracts  
especially for contracts that effect our significant aspects

**4. Comments on environmental management policies and procedures reviewed during  
this audit:**

**5. Comments on management quality and information organization:**

**Signature of EMS Auditor(s):**

**Facility Name:** U.S. Environmental Protection Agency Region III **Date:**

**Requirement:** 4.3.2 Legal and Other Requirements

**Finding 5 :**

The Executive Order 13101 requiring Green Purchasing and RCRA 6002 requiring Affirmative Procurement is not well-understood or complied with. Also, the Region has not identified a Regional Recycling Coordinator, per E.O. 13101, Environmental Preferable Purchasing.

**1. What is your rating for this activity?** Unacceptable

**2. In which areas or criteria do you find this activity strong?**

**3. In which areas or criteria do you find this activity weak?**

1. All requirements of E.O. 13101 should be examined to develop the significant environmental aspects.
2. Many interviewers were concerned or did not know of the requirements and expressed concern about controlling credit card purchases. The audit team could not determine the level of compliance with those requirements. Also, many interviewees did not have a full understanding of the requirements and were concerned about controlling credit card purchases.
3. The audit team could not determine the level of compliance with the applicable EOs and RCRA 6002.

**4. Comments on environmental management policies and procedures reviewed during this audit:**

**5. Comments on management quality and information organization:**

**Signature of EMS Auditor(s):**

**Facility Name:** U.S. Environmental Protection Agency Region III **Date:**

**Requirement:** 4.3.2 Legal and Other Requirements

<b>Finding <u>6</u> :</b>  Unable to determine if the EMS team evaluated internal instructions and Regional Orders.
<b>1. What is your rating for this activity?</b> Conditional
<b>2. In which areas or criteria do you find this activity strong?</b>
<b>3. In which areas or criteria do you find this activity weak?</b>
<b>4. Comments on environmental management policies and procedures reviewed during this audit:</b>  Has internal requirements such as Regional Orders/Office Instructions been reviewed for their impact on the Regional EMS. For example: Posting notices on entry way doors may not be allowed or are there better ways to communicate these messages.
<b>5. Comments on management quality and information organization:</b>

**Signature of EMS Auditor(s):**

**Facility Name:** U.S. Environmental Protection Agency Region III **Date:**

**Requirement:** 4.3.4 Environmental Management Program (EMP)



<p><b>Finding <u>8</u> :</b></p> <p>Regional Action Plans are well-established for the 3 significant regional aspects (gas, electricity and paper).</p>
<p><b>1. What is your rating for this activity?</b>    Acceptable</p>
<p><b>2. In which areas or criteria do you find this activity strong?</b></p> <p>The Region has established Regional Action Plans to meet its objective and targets. The Regional Action Plans are part of the EMS and located on the EMS internet page.</p>
<p><b>3. In which areas or criteria do you find this activity weak?</b></p> <p>The Regional Action Plans are hard to locate on the website given the large amount of information supportive of the EMS.</p>
<p><b>4. Comments on environmental management policies and procedures reviewed during this audit:</b></p> <ol style="list-style-type: none"> <li>1. Management may want to develop an “EMS lite webpage” to summarize the main highlights. Currently, EMP list the designate position for achieving the objectives and targets; may want to list the responsible employee by name.</li> <li>2. Employees and mid-level managers are not aware of EMPs and targets.</li> <li>3. EMS/EMP are not part of the regular work culture; the EMS is still viewed by many as an “add-on program” (another transitory project or other people work on it).</li> </ol>
<p><b>5. Comments on management quality and information organization:</b></p>

**Signature of EMS Auditor(s):**

**Facility Name:** U.S. Environmental Protection Agency Region III **Date:**

**Requirement:** 4.3.4 Environmental Management Program (EMP)

**Finding 9 :**

The Environmental Management Program (EMP) does not solicit new or best management practices that can be incorporated to enhance meeting the objective of the significant environmental aspect. It's limited and narrowly written (too prescriptive).

**1. What is your rating for this activity? Conditional**

- Acceptable / Conditional, after corrective actions / Unacceptable

**2. In which areas or criteria do you find this activity strong?**

The EMPs that are established have well-written and formal goals, targets and objectives.

**3. In which areas or criteria do you find this activity weak?**

E.g., Paper reduction activities in either areas are not shared for all to incorporate. For example: The EMP process does not allow other approaches or better ideas to be communicated or shared. A best management practice approach should be developed in the EMPs to increase communication of the Regional EMS (publicize mini-success stories).

**4. Comments on environmental management policies and procedures reviewed during this audit:****5. Comments on management quality and information organization:**

**Signature of EMS Auditor(s):**

**Facility Name:** U.S. Environmental Protection Agency Region III **Date:**

**Requirement:** 4.4.3 Implementation and Operations 4.2.1 Structure and Responsibility

<b>Finding 11 :</b>  Roles and Responsibilities at the Division level not fully defined.
<b>1. What is your rating for this activity?</b> Conditional
<b>2. In which areas or criteria do you find this activity strong?</b>
<b>3. In which areas or criteria do you find this activity weak?</b>
Roles and responsibilities are defined for the EMS coordinator but the role of each division is not well-understood. A clearer definition of the roles of the division and within the division would also push down the responsibility of implementing the EMS closer to staff.
<b>4. Comments on environmental management policies and procedures reviewed during this audit:</b>
<b>5. Comments on management quality and information organization:</b>

**Signature of EMS Auditor(s):**

**Facility Name:** U.S. Environmental Protection Agency Region III **Date:**

**Requirement:** 4.4 - 4.4.2 Training, Awareness and Competence

<p><b>Finding 12 :</b></p> <p>New employee orientation training does not cover EMS awareness training.</p>
<p><b>1. What is your rating for this activity?</b> Conditional</p>
<p><b>2. In which areas or criteria do you find this activity strong?</b></p>
<p>Awareness Training completed and documented.</p>
<p><b>3. In which areas or criteria do you find this activity weak?</b></p>
<p>The Region 3 EMS procedures requires that all new employees will receive EMS awareness training. This is not part of the Human Resource's new employee orientation information at this time.</p>
<p><b>4. Comments on environmental management policies and procedures reviewed during this audit:</b></p>
<p><b>5. Comments on management quality and information organization:</b></p>

**Signature of EMS Auditor(s):**

**Facility Name:** U.S. Environmental Protection Agency Region III **Date:**

**Requirement:** 4.4.1 Structure and Responsibility

**Finding 10 :**

Roles and responsibilities at the Division level are not fully defined or understood.

**1. What is your rating for this activity? Conditional****2. In which areas or criteria do you find this activity strong?**

The EMS is well-documented on a regional level; however, the audit team recommends that the divisions should take on a greater responsibility of implementing the EMS objectives and targets.

**3. In which areas or criteria do you find this activity weak?**

The EMS could be better communicated in order to facilitate effective environmental management. The EMS coordinator needs support from all supervisory staff to actively communicate the EMS message to employees. Clearer responsibilities at the Division and lower level(s) would be beneficial.

**4. Comments on environmental management policies and procedures reviewed during this audit:****5. Comments on management quality and information organization:**

**Signature of EMS Auditor(s):**

**Facility Name:** U.S. Environmental Protection Agency Region III **Date:**

**Requirement:** 4.4 - 4.4.2 Training, Awareness and Competence

<b>Finding __ :</b>  New employee orientation training does not cover EMS awareness training.
<b>1. What is your rating for this activity?</b> Conditional
- Acceptable / Conditional, after corrective actions / Unacceptable
<b>2. In which areas or criteria do you find this activity strong?</b>
Awareness training completed and documented.
<b>3. In which areas or criteria do you find this activity weak?</b>
The Region 3 EMS procedures requires that all new employees will receive EMS awareness training. This is not part of the Human Resource's new employee orientation information at this time.
<b>4. Comments on environmental management policies and procedures reviewed during this audit:</b>
<b>5. Comments on management quality and information organization:</b>

**Signature of EMS Auditor(s):**



**Facility Name:** U.S. Environmental Protection Agency Region III **Date:**

**Requirement:** 4.4.2 Training, Awareness and Competence

<p><b>Finding 13 :</b></p> <p>Greater need for Professional EMS training and auditor training.</p>
<p><b>1. What is your rating for this activity?</b> Unacceptable/Conditional</p>
<p><b>2. In which areas or criteria do you find this activity strong?</b></p> <p>There are some trained auditors and EMS training has been provided in the Region.</p>
<p><b>3. In which areas or criteria do you find this activity weak?</b></p> <p>EMS's are being used throughout different programs - SEPs, Performance Track, and public sector municipal assistances, that will require a more in-depth knowledge of EMS by the staff. Also, because of the size of the organization and the scope of a Regional EMS there is a need for more auditors to be available for internal audits.</p>
<p><b>4. Comments on environmental management policies and procedures reviewed during this audit:</b></p>
<p><b>5. Comments on management quality and information organization:</b></p>

**Signature of EMS Auditor(s):**

**Facility Name:** U.S. Environmental Protection Agency Region III **Date:**

**Requirement:** 4.4.3 Communication

<b>Finding <u>14</u> :</b>  There is no formal communication mechanism back to the EMS coordinator.
<b>1. What is your rating for this activity?</b> Conditional
<b>2. In which areas or criteria do you find this activity strong?</b>
<b>3. In which areas or criteria do you find this activity weak?</b>
There is no feedback loop from staff to communicate up to the coordinator (EMS Team) with new ideas or recommendations. ( Suggestion; Team may want to solicit feedback on a regular basis)
<b>4. Comments on environmental management policies and procedures reviewed during this audit:</b>
<b>5. Comments on management quality and information organization:</b>

**Signature of EMS Auditor(s):**

**Facility Name:** U.S. Environmental Protection Agency Region III **Date:**

**Requirement:** 4.4.3 Communication

**Finding 15 :**

The EMS audit found formal communication links at certain levels of the organization but not at all levels.

**1. What is your rating for this activity?** Conditional

**2. In which areas or criteria do you find this activity strong?**

There was a clear connection of communication from senior management to the division level.

**3. In which areas or criteria do you find this activity weak?**

There seems to be a lack of awareness of the goals and progress from the division down to staff, except for the staff on the EMS integration team.

**4. Comments on environmental management policies and procedures reviewed during this audit:**

There appears to be a need to get **line** management to “own “ EMS performance to become a best performer.

**5. Comments on management quality and information organization:**

**Signature of EMS Auditor(s):**

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**Facility Name:** U.S. Environmental Protection Agency Region III **Date:**

**Requirement:** 4.4.3 Communication

<p><b>Finding 16 :</b></p> <p>Communication of the EMS could be enhanced with information on the presence of the objective and targets updated more frequently.</p>
<p><b>1. What is your rating for this activity?</b> Acceptable</p>
<p><b>2. In which areas or criteria do you find this activity strong?</b></p>
<p><b>3. In which areas or criteria do you find this activity weak?</b></p> <p>Updates were provided; increasing the frequency of the updates may maintain interest and inspire employees to do more. Thus, increasing results in all levels of the organization.</p>
<p><b>4. Comments on environmental management policies and procedures reviewed during this audit:</b></p>
<p><b>5. Comments on management quality and information organization:</b></p>

**Signature of EMS Auditor(s):**

**Facility Name:** U.S. Environmental Protection Agency Region III **Date:**

**Requirement:** 4.3.3 Objectives and Targets

**Finding 17 :**

Regional objectives and targets are listed on the website; discussed at EMS team meetings; and are part of the awareness training to all employees.

**1. What is your rating for this activity?** Acceptable

**2. In which areas or criteria do you find this activity strong?**

The Region has established the objectives and targets for its significant environmental aspects. The objectives and targets are documented on the Region 3 EMS internet website.

**3. In which areas or criteria do you find this activity weak?**

Current ways to communicate the Regional objectives and targets may not be effective. Most employees are not aware of the objectives and targets of the EMS.

**4. Comments on environmental management policies and procedures reviewed during this audit:**

Interested parties are mentioned, but no effort to define them.  
Also, the procedure requires the organization to keep the view of interested parties.  
(Audit team was unable to determine if this is being done.)

**5. Comments on management quality and information organization:**

**Signature of EMS Auditor(s):**



**Facility Name:** U.S. Environmental Protection Agency Region III **Date:**

**Requirement:** 4.4.5 Document Control (See related funding \_\_\_\_\_.)

**Finding 18 :**

The EMS Regional Procedure Manual needs to include approval signature lines for senior management review and evaluation in all of the applicable procedures. Also, the documents need to be dated and the specific author identified.

**1. What is your rating for this activity?** Conditional

**2. In which areas or criteria do you find this activity strong?**

**3. In which areas or criteria do you find this activity weak?**

**4. Comments on environmental management policies and procedures reviewed during this audit:**

**5. Comments on management quality and information organization:**

**Signature of EMS Auditor(s):**

**Facility Name:** U.S. Environmental Protection Agency Region III **Date:**

**Requirement:** 4.4.5 Document Control (Also, see 4.5.3 and 4.6)

**Finding 19 :**

Corrective Action Report Form, EPA HQ Audit (Dec. 03) not signed by top management. No indication of management review/evaluation and approval.

**1. What is your rating for this activity?** Unacceptable

- Acceptable / Conditional, after corrective actions / Unacceptable

**2. In which areas or criteria do you find this activity strong?**

**3. In which areas or criteria do you find this activity weak?**

**4. Comments on environmental management policies and procedures reviewed during this audit:**

**5. Comments on management quality and information organization:**

**Signature of EMS Auditor(s):**

**Facility Name:** U.S. Environmental Protection Agency Region III **Date:**

**Requirement:** 4.4.6 Operational Controls

**Finding 20 :**

EMS shall extend to contractors.

**1. What is your rating for this activity?** Unacceptable

**2. In which areas or criteria do you find this activity strong?**

**3. In which areas or criteria do you find this activity weak?**

The scope of the Region III EMS needs to include contractors.

**4. Comments on environmental management policies and procedures reviewed during this audit:**

It's identified in the manual but may not be occurring in practice because employees responsible are not aware of operating controls.

**5. Comments on management quality and information organization:**

Employees and managers are not aware of operational controls even though they have responsibility for participating in the implementation. No operational controls for divisions and offices (operational controls are regional and general; some offices could benefit from direction.

**Signature of EMS Auditor(s):**

**Facility Name:** U.S. Environmental Protection Agency Region III **Date:**

**Requirement:** 4.5.2 Non-Conformance and Corrective and Preventive Action (See 4.6 and 4.4.5)

<b>Finding <u>21</u> :</b>  The Corrective Action Report from the EMS December 2003 audit does not follow the EMS Regional Procedure Manual.
<b>1. What is your rating for this activity?</b> Unacceptable
<b>2. In which areas or criteria do you find this activity strong?</b>
<b>3. In which areas or criteria do you find this activity weak?</b>
The date of corrective action and the date of completion of preventive action was not provided in the corrective action report. See EMS Procedure P.
<b>4. Comments on environmental management policies and procedures reviewed during this audit:</b>
<b>5. Comments on management quality and information organization:</b>
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**Signature of EMS Auditor(s):**

**Facility Name:** U.S. Environmental Protection Agency Region III **Date:**

**Requirement:** 4.6 Management Review

<p><b>Finding <u>21</u> :</b></p> <p>The Management Review shall be documented.</p>
<p><b>1. What is your rating for this activity?</b> Unacceptable</p>
<p><b>2. In which areas or criteria do you find this activity strong?</b></p>
<p><b>3. In which areas or criteria do you find this activity weak?</b></p> <p>The Environmental Management System should be evaluated to ensure its continuing suitability, adequacy and effectiveness. This review shall be documented. There is no available documented management review.</p>
<p><b>4. Comments on environmental management policies and procedures reviewed during this audit:</b></p>
<p><b>5. Comments on management quality and information organization:</b></p>

**Signature of EMS Auditor(s):**

**Facility Name:** U.S. Environmental Protection Agency Region III **Date:**

**Requirement:** 4.4.3 Communication

<b>Finding 17 :</b>  Operational Controls not communicated to all levels.
<b>1. What is your rating for this activity?</b> Conditional
<b>2. In which areas or criteria do you find this activity strong?</b>
Very good website; however, most employees do not use.
<b>3. In which areas or criteria do you find this activity weak?</b>
Need to use more creative ways to communicate the regional EMS message. E.g., write success stories in the “Protector”; use computer pop-ups for tip of the day; brainstorm possible EMS operational controls at office retreats, etc.
<b>4. Comments on environmental management policies and procedures reviewed during this audit:</b>
<b>5. Comments on management quality and information organization:</b>

**Signature of EMS Auditor(s):**